

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**[PROPOSED] ORDER GRANTING DEFENDANT'S  
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2021, upon consideration of Defendant Google LLC's Motion to Retain Documents Under Seal, Memorandum of Law in Support, supporting Declarations, and any opposition and reply thereto, IT IS HEREBY ORDERED that:

1. Google's request to retain under seal portions of the deposition transcript of Plaintiff, Ulku Rowe, filed in redacted form as Exhibit 1 to the Declaration of Sara B. Tomezsko (ECF 143-1), is GRANTED;
2. Google's request to retain under seal portions of the deposition transcript of Tariq Shaukat, filed in redacted form as Exhibit 3 to the Declaration of Sara B. Tomezsko (ECF 143-3), is GRANTED;
3. Google's request to retain under seal portions of the hiring packet for Evren Eryurek, filed in redacted form as Exhibit 11 to the Declaration of Sara B. Tomezsko (ECF 143-11, is GRANTED;

4. Google's request to retain under seal portions of the hiring packet for Jonathan Donaldson, filed in redacted form as Exhibit 13 to the Declaration of Sara B. Tomezsko (ECF 143-13), is GRANTED;

5. Google's request to retain under seal email correspondence concerning employee compensation, filed under seal as Exhibit 20 to the Declaration of Sara B. Tomezsko (ECF 143-20), is GRANTED;

6. Google's request to retain under seal portions of Plaintiff's year-end 2017 performance review, filed in redacted form as Exhibit 21 to the Declaration of Sara B. Tomezsko (ECF 143-21), is GRANTED;

7. Google's request to retain under seal portions of Plaintiff's mid-year 2018 performance review, filed in redacted form as Exhibit 22 to the Declaration of Sara B. Tomezsko (ECF 143-22), is GRANTED;

8. Google's request to retain under seal portions of Plaintiff's year-end 2019 performance review, filed in redacted form as Exhibit 23 to the Declaration of Sara B. Tomezsko (ECF 143-23), is GRANTED;

9. Google's request to retain under seal portions of email correspondence identifying clients and business strategies, filed in redacted form as Exhibit 24 to the Declaration of Sara B. Tomezsko (ECF 143-24), is GRANTED;

10. Google's request to retain under seal portions of email correspondence identifying clients and business strategies, filed in redacted form as Exhibit 25 to the Declaration of Sara B. Tomezsko (ECF 143-25), is GRANTED;

11. Google's request to retain under seal portions of email correspondence identifying what defendant believes to be Plaintiff's personal cell phone number, filed in redacted form as Exhibit 34 to the Declaration of Sara B. Tomezsko (ECF 143-34), is GRANTED;

12. Google's request to retain under seal portions of email correspondence identifying candidates who applied for positions at Google, filed in redacted form as Exhibit 35 to the Declaration of Sara B. Tomezsko (ECF 143-35), is GRANTED;

13. Google's request to retain under seal portions of email correspondence identifying clients, filed in redacted form as Exhibit 38 to the Declaration of Sara B. Tomezsko (ECF 143-38), is GRANTED;

14. Google's request to retain under seal portions of email correspondence identifying candidates who applied for positions, filed in redacted form as Exhibit 40 to the Declaration of Sara B. Tomezsko (ECF 143-40), is GRANTED;

15. Google's request to retain under seal the declaration of Google compensation analyst Chris Humez, filed under seal (ECF 140), is GRANTED;

16. Google's request to retain under seal portions of the declaration of Will Grannis, filed in redacted form (ECF 142) is GRANTED;

17. Google's request to retain under seal Software Engineering job ladder, filed under seal as Exhibit 1 to the Declaration of Kevin Lucas (ECF 141-1), is GRANTED;

18. Google's request to retain under seal Tech Manager job ladder, filed under seal as Exhibit 2 to the Declaration of Kevin Lucas (ECF 141-2), is GRANTED;

19. Google's request to retain under seal Application Engineering job ladder, filed under seal as Exhibit 3 to the Declaration of Kevin Lucas (ECF 141-3), is GRANTED;

20. Google's request to retain under seal Product Manager job ladder, filed under seal as Exhibit 4 to the Declaration of Kevin Lucas (ECF 141-4), is GRANTED.

IT IS SO ORDERED

---

Honorable Lorna G. Schofield  
United States District Judge